

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

PETRO INDUSTRIAL SOLUTIONS, LLC  
(PETRO),

Plaintiff,

vs.

ISLAND PROJECT AND OPERATING  
SERVICES, LLC, VITOL US HOLDING II  
CO., VITOL VIRGIN ISLANDS CORP,  
ANDREW CANNING and OPTIS  
EUROPE, LTD.,

Defendants.

CASE NO. 1:21-CV-00312

**BREACH OF CONTRACT**

JURY TRIAL DEMANDED

**NOTICE OF DEPOSITION OF MERLIN FIGUERIA**

TO: District Court of the V.I.

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Petro Industrial Solutions, LLC v. Island Project and Operating Service, LLC, et. al., Case No. 1:21-CV-00312

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Page 2

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**PLEASE TAKE NOTICE** that pursuant to Federal Rules of Civil Procedure 26, 30 and 32, Plaintiff **PETRO INDUSTRIAL SOLUTIONS, LLC**, by and through undersigned counsel, will take the oral examination of **MERLIN FIGUERIA**, on **June 22, 2023**, at **9:00 am** at **Lee J. Rohn and Associates, LLC at 56 King Street, Christiansted, VI 00820**

This deposition is being taken for use as evidence and/or trial purposes and may be continued from day to day until completed.

RESPECTFULLY SUBMITTED  
LEE J. ROHN AND ASSOCIATES, LLC  
Attorneys for Plaintiff

DATED: April 17, 2023

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Petro Industrial Solutions, LLC v. Island Project and Operating Service, LLC, et. al., Case No. 1:21-CV-00312

**NOTICE OF DEPOSITION OF MERLIN FIGUERIA**

Page 3

**CERTIFICATE OF SERVICE**

**THIS IS TO CERTIFY** that on April 17, 2023, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send a notification of such filing to the following:

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**NOTICE OF DEPOSITION OF MERLIN FIGUERIA**

Page 4

I also caused a true and correct copy of the foregoing to be served via electronic mail upon the following:

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BY: /s/ Lee J. Rohm (kj)